

US Environmental Protection Agency – Region 2
Caribbean Environmental Protection Division
Response and Remediation Branch



*Resource Conservation and Recovery Act (RCRA)
Compliance Evaluation Inspection Report*

Total Petroleum Puerto Rico LMM Airport Aviation Terminal

EPA ID Number: PRD980536023
Mailing Address: P.O. Box 362912
San Juan, Puerto Rico, 00936
Physical Address: Base Muñíz
Carolina, Puerto Rico, 00979
Geographical Coordinates: 18°26'30.10"N, 65°59'39.69"W

Facility Representative(s):

Name: Héctor Sánchez (Not available at inspection)
Title or Position: Terminal Manager
Telephone: 787-792-2920; 787-791-0757 x 7500, 7501 and 7503
Email Address: N/A

Name: José A. Benítez
Title or Position: Terminal Clerk
Telephone: 787-792-2920; 787-791-0757 x 7500, 7501 and 7503
Email Address: N/A

Name: Pedro Rodríguez
Title or Position: Terminal Supervisor
Telephone: 787-792-2920; 787-791-0757 x 7500, 7501 and 7503
Email Address: N/A

Name: Ms. Polauris Vázquez (Not available at inspection)
Title or Position: HSEQ Manager
Telephone: 787-354-2123
Email Address: polauris.vazquez@tpprc.com

EPA Inspector(s) Information:

Name: Rosana Caballer Cruz
Telephone: 787-977-5880
Email Address: caballer.rosana@epa.gov

Name: Jesse Avilés
Telephone: 787-977-5882
Email Address: aviles.jesse@epa.gov

Inspection Date: April 22, 2016

Project ID: CEPD-RCRA-16-0367

Record Schedule: 108-025-05 478(b)

Status: FINAL

Reason for the Inspection: Core Program

1 INTRODUCTION

A Resource Conservation and Recovery Act (RCRA) Compliance Evaluation Inspection (CEI) was conducted on April 22, 2016 at Total Petroleum Puerto Rico LMM Airport Aviation Terminal (the facility). The facility is located at Base Muñiz, Carolina, Puerto Rico. Refer to Figure 1 for the location and to Figure 2 for an aerial photograph of the facility. The CEI consisted of: an opening meeting, a facility walkthrough, and a closing meeting. The review of facility documents was done afterwards, as agreed, at the Total Administrative Office, located at City View Plaza, Tower I on Tuesday April 26, 2016 at 2:00 pm. We agreed to review the documentation on a later date because we did not have access to the documents during the inspection.

In accordance to EPA records, EPA has conducted one (1) inspection to this facility on 2003 and the Puerto Rico Environmental Quality Board (PR EQB) has conducted three (3) inspections. As a result of the November 23, 2009 CEI, the PR EQB registered five (5) violations in RCRAInfo. According to RCRA Info, this facility is a Large Quantity Generator (LQG).

2 OPENING MEETING

We arrived at the facility around 0945hrs and met with Mr. José A. Benítez, LMM Terminal Clerk and with Mr. Pedro Rodríguez, LMM Terminal Supervisor for the opening meeting. We identified ourselves as EPA RCRA enforcement officers and told them that the purpose of our visit was to conduct a CEI at the facility to evaluate its hazardous waste management practices and compliance. As part of our opening meeting, we discussed the RCRA Program and explained to them our inspection protocols. Additionally, we told them that as part of our CEI, we needed to take pictures of the areas inspected.

At this opening meeting, we also made a request of the documents that we were going to evaluate as part of our CEI. The documents requested are as follows: biennial report, lay-out of the facility, weekly reports, waste minimization plan, contingency plan, Spill Prevention, Control, and Countermeasure (SPCC) Plan, job description, last three (3) years of hazardous waste manifests, RCRA Air (AA, BB, CC) determination/Leak Detection and Repair (LDAR) related documents, and the trainings documents. Soon after, Mr. Benítez and Mr. Rodríguez accompanied us for the walkthrough of the facility.

3 FACILITY PHYSICAL DESCRIPTION AND OPERATION

The Total Petroleum LMM Airport Aviation Terminal is a petroleum storage facility that is located at Base Muñiz Carolina, Puerto Rico. This facility is owned by Total Petroleum Puerto Rico Corp. (TPPRC; Total). Total is the world's fourth-largest oil and gas company¹. Total started conducting business in Puerto Rico in 2004 and has over 230 service stations around the island and St. Thomas, U.S. Virgin Islands (USVI). At this site, the facility has the capability to store fuel (AV Gas and Jet fuel) received from the Total Guaynabo Terminal. At the facility, jet fuel is also supplied mainly to commercial airplanes from companies that already have an active contract with Total. However, the facility representatives told us that they have provided jet fuel to private airplanes as well.

¹ TPPRC website: <http://www.total.com/en/total-global-energy-operator>

Currently, the facility consists of the following areas: one (1) administrative building, one (1) area designated as the mechanical workshop area, one (1) slop tank, and six (6) tanks: four (4) for jet fuel, one (1) for AV gas and one (1) out of service. The facility operates 24 hrs / 7 days a week because this facility works with the airport (LMM) schedule. Currently, approximately 30 full time employees work at this facility.

4 SOLID AND HAZARDOUS WASTE GENERATION

During the opening meeting, we asked Mr. Benítez and Mr. Rodríguez about their hazardous waste, universal waste and used oil generation. Information related to their generation is as follows:

Universal Waste:

We asked Mr. Benítez and Mr. Rodríguez about the facility universal waste generation. According to them, the facility barely generates universal wastes. The facility representatives told us that they have generated spent batteries.

Used Oil:

According to Mr. Benítez and Mr. Rodríguez, the facility is currently generating used oil related to jet fuel and AV Gas.

Hazardous Waste:

According to Mr. Benítez and Mr. Rodríguez, the facility is not generating hazardous waste.

5 FACILITY WALKTHROUGH

Mr. Rodríguez accompanied us during the facility walkthrough. During the facility walkthrough we inspected the following areas: Mechanical Workshop Area, and the Slop Tank Area. The observations for each area are described below. Refer to Appendix 1 for pictures taken during the inspection.

5.1 MECHANICAL WORKSHOP AREA

This area is located just at right side of the administrative office. At the time of the inspection, the area has a ceiling, concrete floor, and no physical barriers were observed preventing the access to it. During our inspection two (2) mechanical technicians were working at their shift. We introduced ourselves and explained to them that we were going to inspect this area as part of our RCRA inspection. We observed the following:

- One (1) 55-gallons container with used absorbent material (aka pampers). At the time of the inspection, this container was not labeled and not dated. Furthermore, a secondary containment was not observed for this container.

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- One (1) 55-gallons container labeled as "Used Oil." At the time of the inspection, this container was ½ full and not dated. In this case, a secondary containment was observed for this container (Picture #1).
- Five (5) 55-gallons containers. At the time of the inspection, these containers were empty. All of them were labeled as hazardous waste and the information available at their label is not from TPPRC, is from ESSO Company (former facility) (Picture #1).
- One (1) 6-gallons container with oily waste (sample test tubes only) (Picture #2). According to Mr. Rodríguez, the samples tubes discarded at this container were used to review if the Total product tested is in good condition. According to the facility representative, a good condition means that the product does not contain and/or were not mixed (or in contact) with water.

In addition, approximately forty (40) spent fluorescent lamps were stored at this area. At the time of the inspection, these spent fluorescent lamps were not placed into any container that prevents those lamps to be broken, and none of the spent fluorescent lamps were labeled (Picture #2). In addition, at the time of the inspection, one (1) of the spent fluorescent lamps was broken and the fragments were laying on the floor. We asked Mr. Rodriguez and the technicians about these spent fluorescent lamps and about their storage protocols. According to the facility representatives, these spent fluorescent lamps have been stored at this area approximately 1 ½ month ago and they are awaiting management's permission to dispose them accordingly.

We explained to the facility representative the following:

- The containers observed at this area need to be labeled and dated at all times.
- The spent fluorescents lamps observed at this area need to be stored properly. They need to be inside containers that prevent breakage. Also, the containers need to be labeled and dated at all times. In addition, spent fluorescents lamps need to comply with disposal timeframes.
- The five (5) empty containers. We inquired Mr. Rodriguez and the mechanical technicians about these containers. We asked them why the information presented at the labels are from ESSO Company instead of the information of the current facility (TPPRC). The facility representatives told us that they inherited these containers from the former company and the decision made by the current company was to have them available in case these were needed.

5.2 SLOP TANK AREA

This area was located at right side of the Mechanical Shop Area. At the time of the inspection, a 14,000-gallons tank within a secondary containment was observed (Picture #3). According to the facility representative, this area is also known as the Tank #6 Area. At the time of the inspection, the tank appears to be in good condition; leaks, stains and/or spills were not observed. Furthermore, the facility representative told us that the secondary containment has been treated with epoxy (Picture #4). In addition, according to Mr. Rodríguez, the tank was emptied approximately two (2) weeks ago.

6 DOCUMENTS REVIEW

After the facility walkthrough, a review of the facility's documentations related to its hazardous waste management practices could not be done. We were notified by Mr. Rodríguez and Mr. Benítez that Mr. Sanchez was out of the facility that day and his office was closed and locked. The documents to be

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evaluated were inside his office and could not be retrieved. Afterwards, Mr. Sánchez and Mr. Benítez called Ms. Polauris Vázquez, HSEQ Manager to let her know about this situation. Mr. Benítez notified me that Ms. Vázquez was available and we told her that the documents were requested as part of the inspection that we are holding at the facility. She notified me that Mr. Sánchez is the custodian of the facility documents and he was not available at the moment. In addition, she told me that she was not available at that moment because she was attending a training outside her duty station (Guaynabo Terminal Office). We agreed to meet at Total Petroleum Administrative Office, located at City View Plaza Tower I at 2:00 pm on Tuesday April 26, 2016. According to her, the documents requested would be available and, in addition, she would invite Mr. Sánchez to join us at the meeting. Please refer to Section 8 Follow up Actions for information related to the facility's document review.

7 CLOSING MEETING

After completion of the walkthrough, we met with Mr. Benítez and Mr. Rodríguez to hold a closing meeting. The information point out at this section was previously provided to Ms. Vázquez during our call. We indicated that the purpose of the closing meeting is to inform the facility about the CEI observations. We communicated the facility the following:

Facility Walkthrough:

- *Mechanical Workshop Area* – We explained to the facility representatives that approximately forty (40) spent fluorescent lamps were stored at this area. At the time of the inspection, these spent fluorescent lamps were not placed into any container that prevents those lamps to be broken, and none of the spent fluorescent lamps were labeled (Picture #2). In addition, at the time of the inspection, one (1) of the spent fluorescent lamps was broken and the fragments were laying on the floor.

Documents Review:

- We explained to them that due to the fact that the documents could not be retrieve during the inspection, Ms. Vázquez has agreed to provide the documents for their proper review on a later date.

8 FOLLOW-UP ACTIONS

The revision of the documents was held as scheduled on Tuesday April 26, 2016 at 2:00 pm at Total Petroleum Administrative Office. Ms. Zolymer Luna, US EPA Inspector, accompanied me to meet with Ms. Vázquez and Mr. Sánchez, facility representatives. As agreed, they provided the documentation and accompanied us to answer any question. Information related each document is as follows:

8.1 BIENNIAL REPORT

The biennial report was requested. Ms. Vázquez provided a document that they identified as “biennial report”, but the document lacks the date of submittal. We told Ms. Vázquez that the document presented was not the biennial report and that we needed to review the correct document, which shall include the

date when the document was submitted. We have brought this issue to their attention and we told them that we will request their biennial report as part of a request of information.

8.2 WEEKLY REPORTS

The weekly reports were requested. According to Ms. Vázquez, the facility generates these documents in a monthly basis as part of their SPCC and storm water programs. The last month available for review was February 2016, but according to the facility representatives, the last report was generated in March 30, 2016. After evaluation of the document, the facility appears to be in compliance with this requirement.

8.3 WASTE MINIMIZATION PLAN

The waste minimization plan was requested. Ms. Vázquez has provided a one (1) page document that they identified as “waste minimization plan”. We explained to the facility representatives that as a LQG, the facility certify on the manifest that they have established a “program in place” to reduce the volume or quantity and toxicity of hazardous waste generated to the extent economically practicable². She told us that a document with the description mentioned before is not available and she will work in the update of the document.

8.4 CONTINGENCY PLAN

The contingency plan was requested. Ms. Vázquez explained to us that currently they have available a document that complies with the Facility Response Plan (FRP). This document was dated in December 2013. After reviewed, we asked Ms. Vázquez about the information presented and we confirmed that the document needs to be updated. We told her that as a Large Quantity Generator, the facility needs to have available a copy of the document that complies with 40 C.F.R. § 265.53. She told us that as a result of our Total Bulk Terminal inspection, the facility started to develop a contingency plan according to our regulation.

8.5 SPCC PLAN

The SPCC Plan was requested. Ms. Vázquez provided the document. The last revision of the document was in December 2014. After evaluation of the document, the facility appears to be in compliance with this requirement.

8.6 JOB DESCRIPTION

The job description was requested. Ms. Vázquez provided the documents for the following positions: Operation Manager, and Aviation General Manager. After evaluation of the documents, the facility appears to be in compliance with this requirement.

²[https://yosemite.epa.gov/osw/rcra.nsf/ea6e50dc6214725285256bf00063269d/8D78CAF5DE7D36E98525670F006BCDAD/\\$file/13747.pdf](https://yosemite.epa.gov/osw/rcra.nsf/ea6e50dc6214725285256bf00063269d/8D78CAF5DE7D36E98525670F006BCDAD/$file/13747.pdf). - RCRA Waste Minimization Requirements, June 1995.

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8.7 MANIFESTS

The hazardous waste manifests were requested. Ms. Vázquez and Mr. Sánchez told us that this facility is not generating hazardous waste. However, we told them that, according RCRAInfo³, the facility has been classified as LQG. We asked them if the facility, prior to our inspection, made any hazardous waste disposal. We explained to them that if that information is correct, the facility needs to have available the last three (3) years of manifests. At the time of the document review, done in April 26, 2016, the facility does not have hazardous waste manifest for review.

We asked about the non-hazardous waste and contact water manifests for review. Information of the manifests reviewed in April 26, 2016 are as follows:

Contact Water Manifests Information:

- Company Name: Vieques Enviro Inc.
Date: April 20, 2016
Number: 0416-264
Quantity: 3,000 gallons
- Company Name: Vieques Enviro Inc.
Date: January 21, 2016
Number: 0116-30
Quantity: 5,061 gallons

Non-Hazardous Waste Manifests Information

- Company Name: Oil and Energy System
Date: April 27, 2015
Disposal: Used Kerosene
Number: 15349
Quantity: 921 gallons
- Company Name: Oil and Energy System
Date: September 26, 2014
Disposal: Jet A: 7,448 gallons
Water: 2,352 gallons

Number: 15108
Quantity: Total: 7,800 gallons

³ We explained to them that prior to our inspection, the facility had submitted the EPA form 8700-12 acknowledging that this facility is a LQG.

Afterwards, we emphasize to the facility representatives that a revision of the hazardous waste manifests has to be done. We have brought this issue to their attention and we told them that we will request their hazardous waste manifests as part of a request of information.

8.8 RCRA AIR (AA, BB, CC) DETERMINATION/LDAR

The documents related to RCRA Air determination and LDAR were requested. We explained to Ms. Vázquez that we requested this information because the facility is classified as LQG. At the time of the evaluation of the documents, it appeared that the facility does not have available the information requested. However, as part of the information submitted by the facility on June 14, 2016, related to their slop tank, the facility does not identify this tank as a hazardous waste unit. Therefore, the facility appears to be in compliance with this requirement.

8.9 TRAININGS

The training documents were requested. Ms. Vázquez has provided the facility employees' certification. According to Ms. Vázquez, the last training was held in March 11, 2016 and was provided for a total of 20 employees. In addition, Ms. Vázquez told us that a hazardous waste material training and a Department of Transportation (DOT) workshop have been scheduled for May 5, 2016. After evaluation of the document, the facility appears to be in compliance with this requirement.

After the evaluation of the documents, we explained to the facility representatives that more information is needed to complete the evaluation of the documents requested above. The information discussed is presented below:

- *Contingency Plan*: The contingency plan evaluated complied with FRP regulations but, as a Large Quantity Generator, the facility needs to have available a copy of the document that complies with 40 C.F.R. § 265.53. In addition, we explained to them that the document evaluated needs to be updated.
- *Waste Minimization Plan*: After the evaluation and discussion of the document presented, Ms. Vázquez told us that she will updating the document.
- *Biennial Report*: We told Ms. Vázquez that the document presented is not the biennial report and that we need to review the correct document, which includes the date when the document was submitted.
- *LQG status*: We explained to them that we still need to confirm facility's generation behavior. According to our records, the facility is a LQG, but we cannot confirm or denied that information because the last three (3) years of manifests were not available for review during the inspection (April 22, 2016) and were not available for review either during the meeting at their office (April 26, 2016). In addition, during our meeting held on April 26, 2016, the facility representatives told us that this facility is not generating hazardous waste, but according to our records and to the EPA Form 8700-12 submitted by the facility in February 29, 2016, the facility maintains the LQG status.

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- *Manifests*: As expressed in the item before, the last three (3) years of manifest were not available for review either during the inspection (April 22, 2016) and were not available during the meeting at their office (April 26, 2016).

In addition, we explained to the facility representatives that additional information is needed and will be requested. The information requested is as follows:

- *Spent fluorescent lamps*: We told them that we will need the information related to the disposal of their spent fluorescent lamps observed at the Mechanical Shop Area.
- *Slop Tank*: We told them that we will need the information related to their slop tank disposal. In addition, we told them that we will need the contents description of the slop tank.
- *Contact Water*: We told them that we will need the information related to their contact water characterization.
- *Biennial Report*: We told them that we still need to review the correct document, including the date when the document was submitted.

Afterwards, we agreed to identify May 20, 2016 as the due date to present the information requested.

In April 28, 2016, an email was sent to Ms. Vázquez requesting the information presented above. On May 17, 2016, a friendly reminder of the request was made to Ms. Vázquez. In May 20, 2016, Ms. Vázquez requested more time to gather all the information needed to respond our request. The extension was granted, until June 10, 2016. The facility did not comply with the extended due date, however, a facility representative hand delivered the response on June 14, 2016. The documents received in this response is as follows: Biennial Report, facility lay out, facility inspection reports, waste minimization plan, facility contingency plan, SPCC Plan for the facility, manifests for their spent fluorescent lamps, manifest for their slop tank, slop tank description and information, and the waste profile of contact water.

9 CONCLUSIONS

9.1 GENERATORS

The facility identifies itself as a Large Quantity Generator. The facility's compliance with the applicable Generator requirements is as follows:

9.1.1 General Standards (40 CFR § 262 Subpart A)

At the time of the inspection, the facility appears to be in compliance with this requirement.

9.1.2 Manifest (40 CFR § 262 Subpart B)

According to §262.20(2) "*The generator maintains a copy of the reclamation agreement in his files for a period of at least three years after termination or expiration of the agreement*".

At the time of the inspection, and during the documents review section held on a later date⁴, the facility did not have available the last three (3) years of hazardous waste manifest for review. In addition, the last three (3) years of hazardous waste manifest were part of the documents requested in April 26, 2016 with an original due date in May 20, 2016, and, after an extension granted⁵, the facility did not provide the hazardous waste manifests.

9.1.3 Pre Transport Requirements (40 CFR § 262 Subpart C)

At the time of the inspection, the facility appears to be in compliance with this requirement.

9.1.4 Recordkeeping and Reporting (40 CFR § 262 Subpart D)

According to § 262.40(a) *“A generator must keep a copy of each manifest signed in accordance with §262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter.”*

At the time of the inspection, and during the documents review section held on a later date⁶, the facility did not have available the last three (3) years of hazardous waste manifest for review. In addition, the last three (3) years of hazardous waste manifest were part of the documents requested in April 26, 2016 with an original due date in May 20, 2016, and, after an extension granted⁷, the facility did not provide the hazardous waste manifests.

9.2 TRANSPORTERS

The facility is not a transporter.

9.3 TREATMENT, STORAGE AND DISPOSAL FACILITIES

The facility is not a Treatment, Storage and Disposal Facility.

10 UNIVERSAL WASTE (40 C.F.R. § 273)

10.1.1 Subpart B – Standards For Small Quantity Handlers Of Universal Waste

According to §273.13(d)(1)(2) *“A small quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows:*

(1) A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such

⁴ April 26, 2016.

⁵ June 10, 2016.

⁶ April 26, 2016.

⁷ June 10, 2016

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containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

(2) A small quantity handler of universal waste must immediately clean up and place in a container any lamp that is broken and must place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. Containers must be closed, structurally sound, compatible with the contents of the lamps and must lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions."

At the time of the inspection, the facility has approximately forty (40) spent fluorescent lamps stored at the Mechanical Workshop Area. These spent fluorescent lamps were not inside any container to prevent them to break, and none of them were labeled. In addition, at the time of the inspection, one (1) of the spent fluorescent lamps was broken and the pieces from this broken spent fluorescent lamp were laying at the floor.

11 USED OIL (40 C.F.R. §279)

11.1.1 Subpart C – Standards For Used Oil Generators

According to §279.22(c)(1) "Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."."

At the time of the inspection, the facility has one (1) 55-gallon container with absorbent material (aka pampers). The container was not labeled or marked clearly with the words "Used Oil".

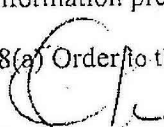
12 MULTI-MEDIA CHECKLIST

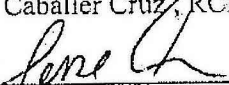
A Multi-Media checklist was performed during the CEI. After performed, a referral to the Multi-Media Referrals Coordinator (MMRC) is not necessary.


13 ENFORCEMENT ACTIONS

Based on the information presented above, I recommend the following enforcement actions:

To issue a 3008(a) Order to the facility for the above mentioned violations.


Rosana Caballer Cruz, RCRA Inspector


Jesse Ayales, RCRA Inspector


David N Cuevas, Lead Physical Scientist
RCRA Team, Response and Remediation Branch

2017 04 12
DATE

2017-04-12
DATE

2017-04-13
DATE



Title:	Facility:	Pictures taken by::
Appendix 1—Facility Location	Total Petroleum SJU Terminal	J. Avilés
EPA ID:	Project:	Date:
PRD980536023	CEPD-RCRA-16-0367	2016-04-22



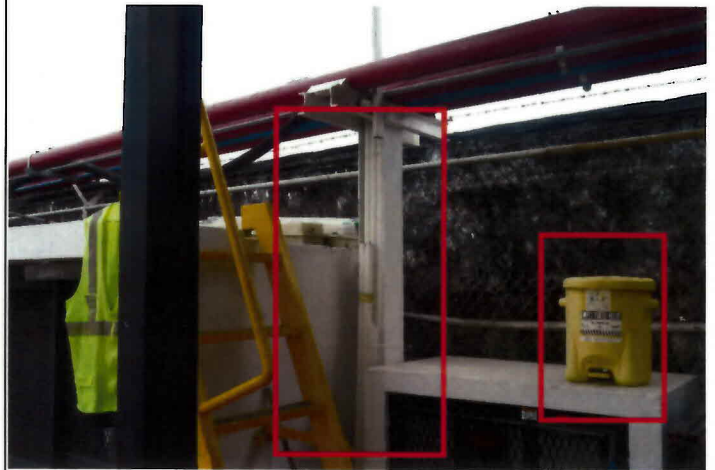
Title:
Appendix 1—Aerial Photograph
EPA ID:
PRD980536023

Facility:
Total Petroleum SJU Terminal
Project:
CEPD-RCRA-16-0367

Pictures taken by::
J. Avilés
Date:
2016-04-22



Picture 1 — Mechanical Workshop Area— Five (5) 55-gallon containers were empty and the label information was from ESSO Company. Also, One (1) 55-gallon container was observed labeled as used oil.



Picture 2 — Mechanical Workshop Area—Approximately 40 spent fluorescent lamps was observed. One of the fluorescent lamps was broken and the fragments were laying on the floor. In addition, one (1) 6 gallon container with oily waste was observed.



Picture 3 — Slop Tank Area—One (1) 14,000-gallon above-ground tank within a secondary containment was observed.



Picture 4 — Slop Tank Area—According to the facility representative, the secondary containment has been treated with epoxy.



Title:
Appendix I—Facility Pictures
EPA ID:
PRD980536023

Facility:
Total Petroleum Puerto Rico LMM
Airport Aviation Terminal
Project:
CEPD-RCRA-16-0367

Pictures taken by:
R. Caballer-Cruz
Date:
2016-04-22

Caballer, Rosana

From: postmaster@PRRMSJU.local
To: Polauris E VÁZQUEZ ALFONSO
Sent: Wednesday, June 08, 2016 11:32 AM
Subject: Delivered: RE: Request of Information - Total Petroleum PR Corp. LMM Airport Aviation Terminal

Your message has been delivered to the following recipients:

Polauris E VÁZQUEZ ALFONSO

Subject: RE: Request of Information - Total Petroleum PR Corp. LMM Airport Aviation Terminal

Sent by Microsoft Exchange Server 2007

Caballer, Rosana

From: postmaster@PRRMSJU.local
To: polauris.vazquez@tpprc.com
Sent: Tuesday, May 17, 2016 6:42 PM
Subject: Delivered: FW: Request of Information - Total Petroleum PR Corp. LMM Airport Aviation Terminal

Your message has been delivered to the following recipients:

polauris.vazquez@tpprc.com

Subject: FW: Request of Information - Total Petroleum PR Corp. LMM Airport Aviation Terminal

Sent by Microsoft Exchange Server 2007

Caballer, Rosana

From: postmaster@PRRMSJU.local
To: polauris.vazquez@tpprc.com
Sent: Thursday, April 28, 2016 10:13 AM
Subject: Delivered: Request of Information - Total Petroleum PR Corp. LMM Airport Aviation Terminal

Your message has been delivered to the following recipients:

polauris.vazquez@tpprc.com

Subject: Request of Information - Total Petroleum PR Corp. LMM Airport Aviation Terminal

Sent by Microsoft Exchange Server 2007

Caballer, Rosana

From: Caballer, Rosana
Sent: Thursday, April 28, 2016 9:58 AM
To: 'polauris.vazquez@tpprc.com'
Subject: Request of Information - Total Petroleum PR Corp. LMM Airport Aviation Terminal

Importance: High

Good Morning Ms. Vázquez;

"On April 22, 2016 Mr. Avilés and I inspected your facility to determine its compliance with RCRA hazardous waste regulations. On April 26, 2016 you informed me that the facility is a Large Quantity Generator (LQG) of hazardous waste. RCRA regulations for hazardous waste handlers are codified in 40 C.F.R. 262. The inspection was performed by the authority provided in §3007 of SWDA. As part of the closing meeting that we held on April 26, 2016 I requested additional information under the same authority. We agreed that the information will be provided no later than Friday May 20, 2016. The information that I requested was:

- Manifest (and any other information related to) of the fluorescent lamps observed at the Mechanical Shop Area
- Manifest (and any other information related to) of the slop tank
- Slop Tank description and information
- Waste profiles (characterization) of the contact water and slop tank
- Method used to take the sample(s)
- Information of the Biennial Report

Thank you in advance for your diligence on this matter.
Have a nice day.

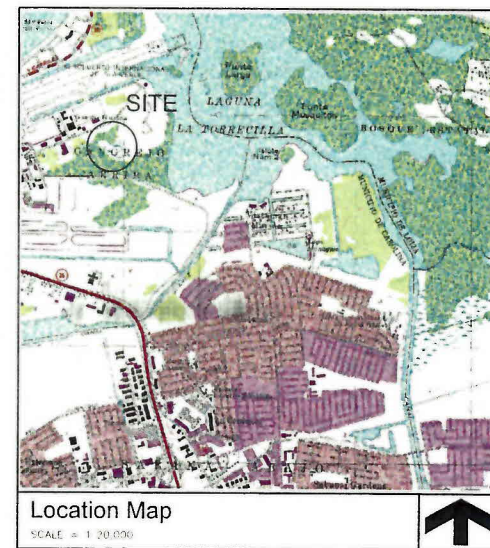
V/R;

Rosana Caballer Cruz
Environmental Engineer
US EPA R2 CEPD RRB

HORIZONTAL AND VERTICAL CONTROL						
BL-1	BEARING	DISTANCE	COORDINATES		ELEVATION (Z)	DESCRIPTION
			NORTH (Y)	EAST (X)		
GPS-1			267,293.9760	245,927.9300	2.136	STEEL NAIL
GPS-2	S 20°52'14"E	11.543 MTS	267,217.8258	245,957.0910	2.052	STEEL NAIL

LEGEND

<ul style="list-style-type: none"> STORM SEWER MANHOLE SANITARY MANHOLE ELECTRICAL MANHOLE TELEPHONE MANHOLE STORM CHIMNEY CATCH BASIN WATER METER BOX STANDARD WATER METER EXISTING VALVE FAKE HYDRANT FAKE OUTLET PIPE EXISTING EXTRUSION BOX SIGN BOUNDARY POLE ELECTRICAL POLE TELEPHONE POLE TRANSMISSION POLE GUARD POLE WALL POLE SANITARY CLEAN OUT EXIST. SANITARY POLE LINE EXIST. STORM SEWER POLE LINE EXIST. FIRE LINE EXIST. TELEPHONE LINE EXIST. TELEPHONE LINE STEEL NAIL 	<ul style="list-style-type: none"> EXIST. FIRE PUMP BASE EXIST. CIRC. DITCH EXIST. STORM & GUTTER EXIST. STORM WAY EXIST. STORM ELEVATION EXIST. TEST BURNING CIRC. EXISTING ORNAMENTAL WOOD FENCE EXISTING BARBED WIRE FENCE EXISTING CHAIN LINK FENCE PROPERTY BOUNDARY LIMIT CONTOUR LEVEL LINE AT 1 METER CONTOUR LEVEL LINE AT 0.5 METER CONTOUR POLE EXISTING PALM TREE DENSE WOOD OR VEGETATION AREA EXIST. STRUCTURE OR BUILDING EXISTING TURNER ELEVATION STATION TOP OF WALL ELEVATION METAL CATHART
--	--



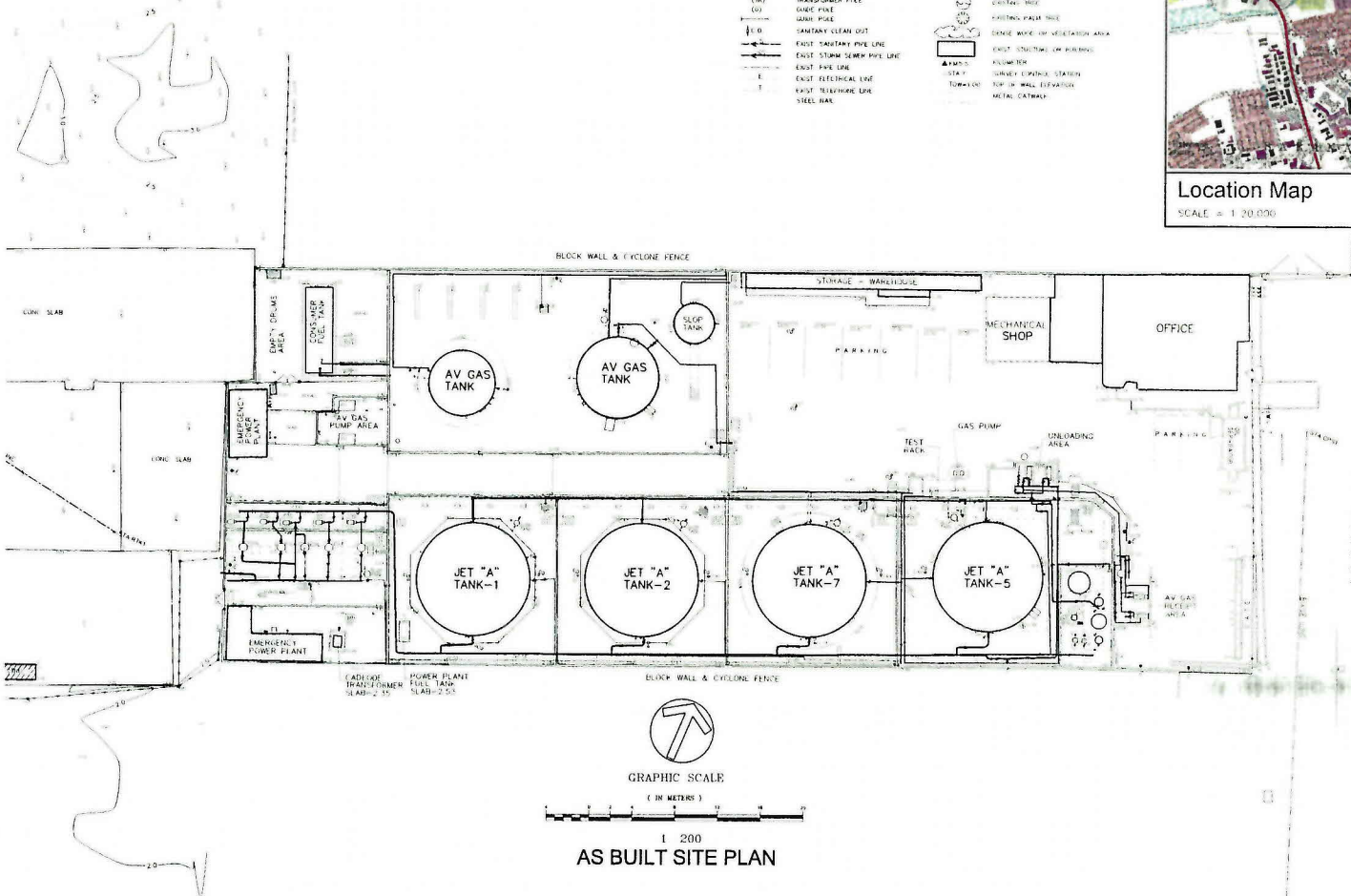
Geo Survey NETWORK
PROFESSIONAL SURVEYING & GEOSPATIAL ENGINEERING

CAGUAS NOROCCIDENTAL, P.R.
P.O. BOX 4960
CAGUAS, P.R. 07258-4960
PHONE: 787-753-4400
FAX: 787-753-4400
KAIL: 787-753-4400

PROFONENT
TOTAL PETROLEUM
PUERTO RICO CORPORATION
SANTANDER TOWER, SUITE-1508
GUAYNABO, PUERTO RICO

PROJECT
TOTAL AIRPORT TERMINAL
LUIS MUÑOZ MARIN AIRPORT TERMINAL
CAROLINA, PUERTO RICO

IMPORTANT NOTES



CERTIFICATION

MARCOS RAMOS, P.L.S.
LIC. 9883

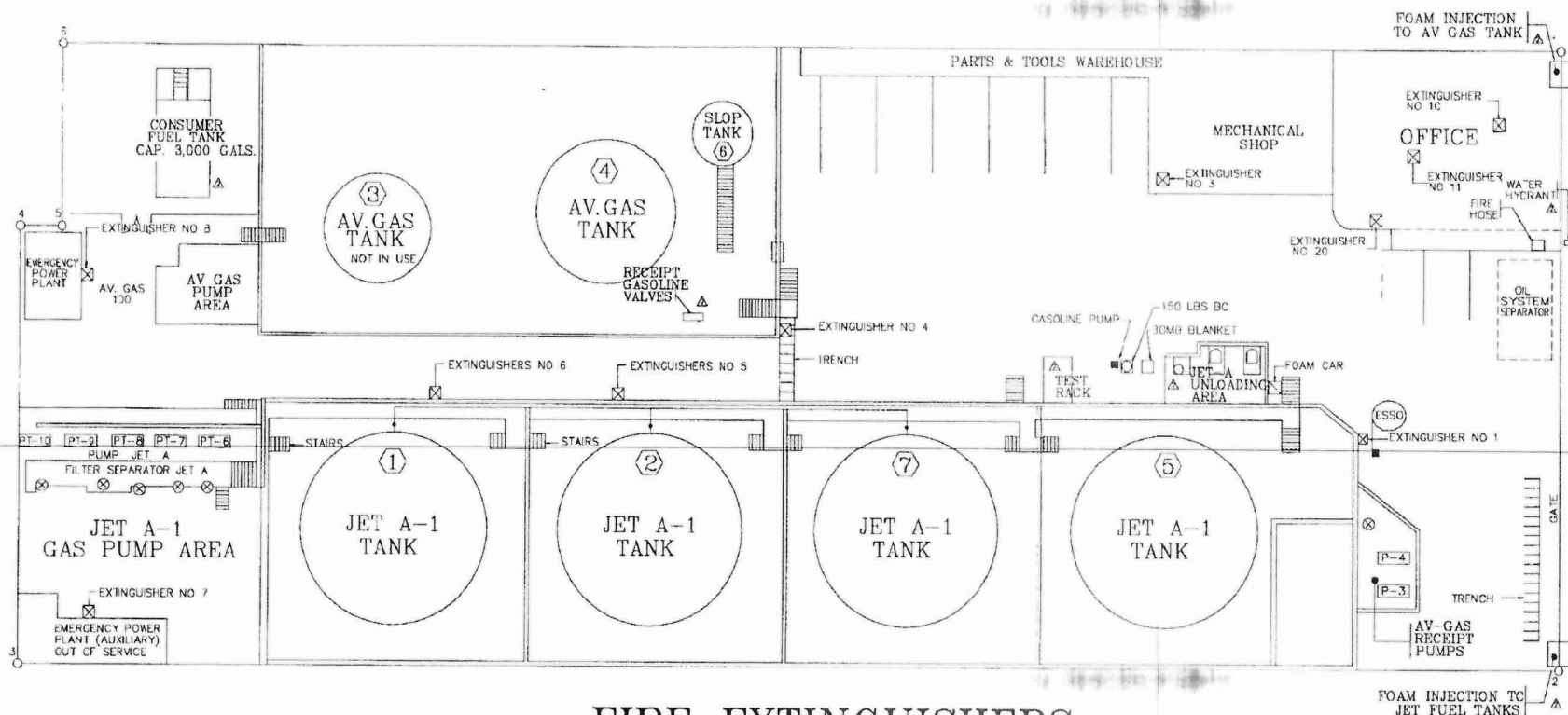
MARCOS RAMOS, P.L.S.
LIC. 9883
PUERTO RICO

- NOTES.**
- 1-ALL UNITS IN THESE DRAWINGS ARE REPRESENTED IN METERS.
 - 2-THE MAJOR OBJECTIVE OF THIS PLAN WAS TO SURVEY ALL INFORMATION NECESSARY TO BUILD A COMPLETE TOPOGRAPHIC PLAN.
 - 3-ALL DATA IN THIS DRAWING WAS GATHERED DURING THE MONTH OF MARCH 2014.
 - 4-THE FOLLOWING SURVEYING EQUIPMENT WERE USED IN THIS PROJECT:
 - a- THE TOPCON GPS MODEL: TRIP-PRISM DUAL FREQUENCY (L1/L2) WITH GLONASS SATELLITES, INTERNAL MEMOR. RADIO
 - b- A TOPCON STATION MODEL: TOPCON 227
 - 5-THE USE OF THIS METHOD REQUIRED WITH GPS AND A PROPORTION OF SCALE FACTOR OF 1:100,000 THEREFORE NO FURTHER WAS DEVELOPED FOR CONVENTIONAL SURVEYING EQUIPMENT.
 - 6-HORIZONTAL DATUM IS PETER HADES (REV 2011) AND VERTICAL DATUM IS MEAN TO SEA LEVEL.
 - 7-THE HORIZONTAL COORDINATE SYSTEM WAS TRANSFERRED TO STATE PLANE COORDINATE "NAD 83" (2011) FEET.
 - 8-THE BASE LINE IS LOCATED ON THE WEST SIDE OF THE W/ AT WEST 1/2 1/2 ROAD PARALLEL EDGE.
 - 9-THE SURVEY INFORMATION WAS LIMITED BY THE EXISTING FENCE PERIMETER.

AS-BUILT SITE PLAN

DRAWING DATE: 20/14/2014
CREATED: 15/MAY/2014

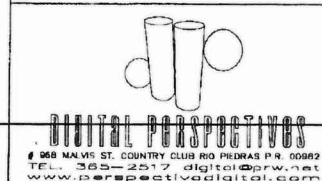
FILE CODE: 14428 SI-1



LEGEND

ITEM	DESCRIPTION
☐	FOAM CAR
☒	20 LBS BC
☐	150 LBS BC
☐	BOMB BLANKET

FIRE EXTINGUISHERS **AND FIRE FIGHTING TERMINAL PLAN**



R E V I S I O N S		
No.	DATE	DESCRIPTION
1	01/94	REVISION NO.1
2	04/01	REVISION NO.2

SCALE: N.T.S.

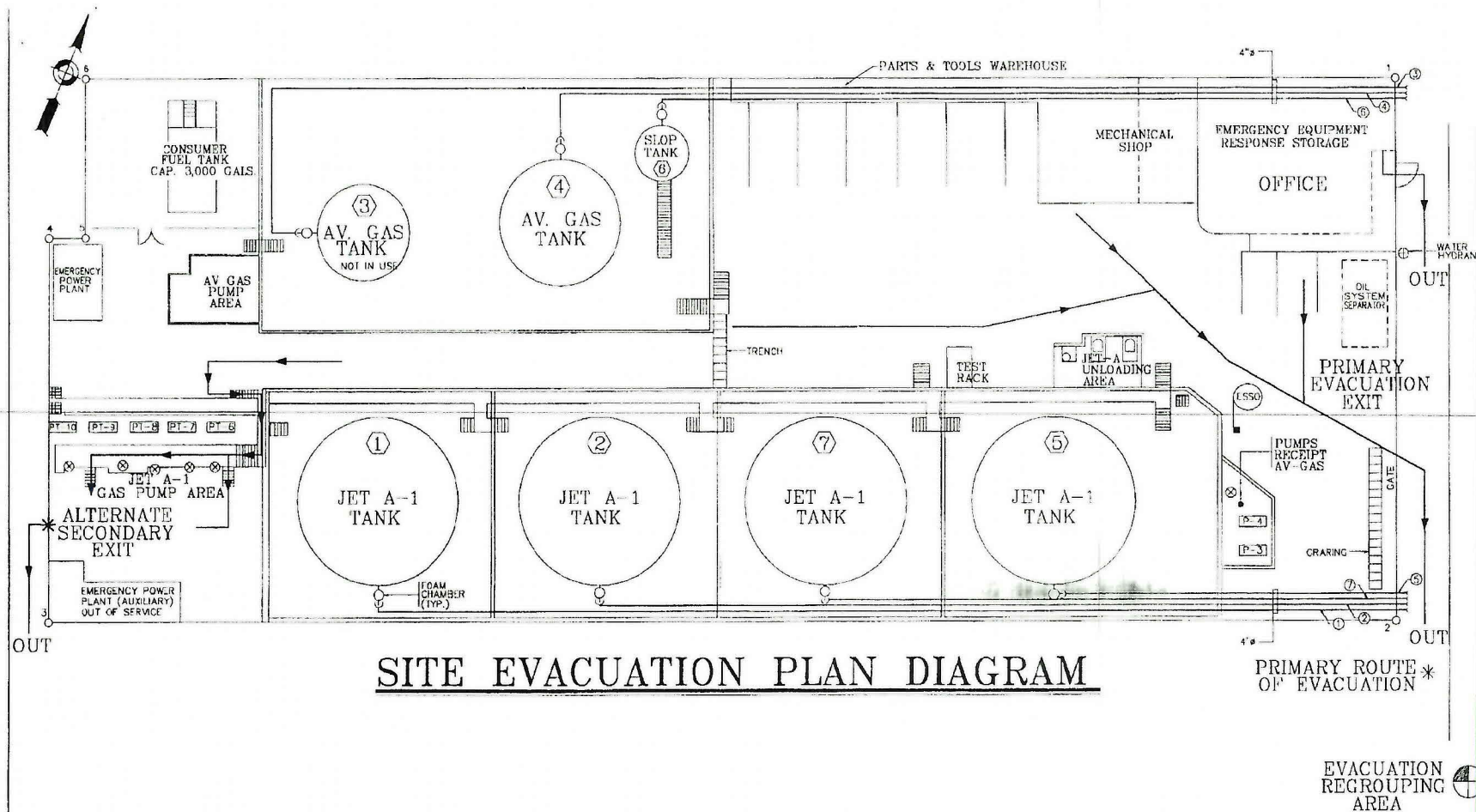
ISSUE DATE: 1/10/94

LUIS MUÑOZ MARIN
AIRPORT TERMINAL
FIRE EXTINGUISHERS
AND FIRE FIGHTING TERMINAL PLAN

FE-1

7 | 28


EMERGENCY ESCAPE ROUTE



SITE EVACUATION PLAN DIAGRAM

IF VISITOR / CONTRACTOR: IN CASE OF AN EMERGENCY, YOU WILL HEAR THE ALARM AND RECEIVE ORDERS FOR EVACUATION. YOU WILL THEN LEAVE THE OFFICE AND EXIT THE PREMISES THROUGH THE MAIN ENTRANCE INTO THE ASSEMBLY POINT A.

IF STAFF: IN CASE OF AN EMERGENCY, YOU WILL HEAR THE ALARM AND ORDERS FOR EVACUATION. ENSURE THAT ALL VISITORS / CONTRACTORS HAVE EVACUATED THE OFFICE. THEN, REGROUP AT THE ASSEMBLY POINT A TO RECEIVE ORDERS FROM THE TERMINAL MANAGER.

Send completed form to this address:	<p align="center">U.S. ENVIRONMENTAL PROTECTION AGENCY</p> <p align="center">RCRA SUBTITLE C SITE IDENTIFICATION FORM (2015)</p> <p align="center">The Appropriate State or EPA Regional Office</p> 	
1. Reason for Submittal MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location) <input type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information). <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # ____). <input checked="" type="checkbox"/> As a component of the Hazardous Waste Report. (If marked, see sub-bullet below) <input checked="" type="checkbox"/> Site was a TSD facility and/or generator of >1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)	
2. Site EPA ID Number	EPA ID Number: PRD980536023	
3. Site Name	Name: TOTAL PETROLEUM PUERTO RICO CORP-LMM AIRPORT AVIATION TERMINAL	
4. Site Location Information	Street Address: BASE MUNIZ City, Town, or Village: CAROLINA State: PR Country: US County: PR127 Zip Code: 00979	
5. Site Land Type	<input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> State <input type="checkbox"/> Other	
6. NAICS Code(s) for the Site	A. 424710 B. C. D.	
7. Site Mailing Address	Street or P. O. Box: PO BOX 362912 City, Town, or Village: SAN JUAN State: PR Country: US Zip Code: 00936	
8. Site Contact Person	First Name: POLAURIS MI: Last Name: VAZQUEZ Title: HSEQ MANAGER Street or P. O. Box: PO BOX 362916 City, Town, or Village: SAN JUAN State: PR Country: US Zip Code: 00936 Email : polauris.vazquez@tpprc.com Phone: 7877498931 Ext: Fax: 7877934754	
9. Operator and Legal Owner of the Site	A. Name of Site's Owner: PUERTO RICO PORTS AUTHORITY Date Became Owner: 05/02/1955 Type: <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> State <input type="checkbox"/> Other Street or P. O. Box: PO BOX 362829, SAN JUAN City, Town, or Village: SAN JUAN Phone: 7877298715 State: PR Country: US Zip Code: 00936	
	B. Name of Site's Operator: TOTAL PETROLEUM PUERTO RICO CORP Date Became Operator: 11/01/2008 Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	

10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-7.**Y ☒ N ☐ 1. Generator of Hazardous Waste**

If Yes, choose only one of the following - a, b, or c.

- ☒ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup

- ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or

- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

If "Yes" above, indicate other generator activities.

Y ☐ N ☒ 2 Short-Term Generator (generate from a short-term or onetime event and not from on-going processes). If "Yes", provide an explanation in the Comments**Y ☐ N ☒ 3. United States Importer of Hazardous Waste****Y ☐ N ☒ 4. Mixed Waste (hazardous and radioactive) Generator****Y ☐ N ☒ 5. Transporter of Hazardous Waste**

If Yes, mark all that apply.

- ☐ a. Transporter
☐ b. Transfer Facility (at your site)

Y ☐ N ☒ 6. Treater, Storer, or Disposer of Hazardous Waste (at your site)

Note: A hazardous waste permit is required for this activity.

Y ☐ N ☒ 7. Recycler of Hazardous Waste (at your site)**Y ☐ N ☒ 8. Exempt Boiler and/or Industrial Furnace**

If Yes, mark each that applies.

- ☐ a. Small Quantity On-site Burner Exemption
☐ b. Smelting, Melting, and Refining Furnace Exemption

Y ☐ N ☒ 9. Underground Injection Control**Y ☐ N ☒ 10. Receives Hazardous Waste from Off-site****B. Universal Waste Activities; Complete all parts 1-2.****Y ☐ N ☒ 1. Large Quantity Handler of Universal Waste** (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all boxes that apply:

- a. Batteries ☐
b. Pesticides ☐
c. Mercury containing equipment ☐
d. Lamps ☐
e. Other (specify) _____ ☐
f. Other (specify) _____ ☐
g. Other (specify) _____ ☐

Y ☐ N ☒ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this

C. Used Oil Activities; Complete all parts 1-4.**Y ☐ N ☒ 1. Used Oil Transporter**
If Yes, mark each that applies.

- ☐ a. Transporter
☐ b. Transfer Facility

Y ☐ N ☒ 2. Used Oil Processor and/or Re-refiner
If Yes, mark each that applies.

- ☐ a. Processor
☐ b. Re-refiner

Y ☐ N ☒ 3. Off-Specification Used Oil Burner**Y ☐ N ☒ 4. Used Oil Fuel Marketer**
If Yes, mark each that applies.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

D. Eligible Academic Entities with Laboratories-Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

You must check with your State to determine if you are eligible to manage laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

- ☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:
- ☐ a. College or University
 - ☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
 - ☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university
- ☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Wastes

A. Waste Codes for Federally Regulated Hazardous Wastes.

Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001, D018

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.

Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

THIS FACILITY DOES NOT GENERATES, IN ANY CALENDAR MONTH, 1,000 KG/MO (2,200 LBS./MO.) OR MORE OF HAZARDOUS WASTE; OR GENERATES, IN ANY CALENDAR MONTH, OR ACCUMULATES AT ANY TIME, MORE THAN 1 KG/MO (2.2 LBS./MO) OF ACUTE HAZARDOUS WASTE; OR GENERATES, IN ANY CALENDAR MONTH, OR ACCUMULATES AT ANY TIME, MORE THAN 100 KG/MO (220 LBS./MO) OF ACUTE HAZARDOUS SPILL CLEANUP MATERIAL IN THE PERIOD CORRESPONDING FOR THE PREPARATION OF THIS REPORT. FOR THIS REASON WE ARE NOT SUBMITTING THE GM FORMS AND/OR OI FORMS.

14. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Operator, Owner, or an Authorized Representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	POLAURIS VAZQUEZ, HSEQ MANAGER	02/29/2016

**PERSONAL PROTECTIVE EQUIPMENT (PPE)
HAZARD ASSESSMENT AND SELECTION FORM FOR EPA REGION 2 FIELD WORK**

Instructions: This form is used to evaluate the correct level of PPE that is to be utilized when conducting field activities. It is to be filled out prior to the commencement of all field activities except where work is being conducted on a Superfund site for which an approved Health and Safety Plan is already in existence. The team leader and/or employee(s) must fill out and sign this form. The supervisor is then required to review and sign off on the completed form. A copy of this form is to be kept by the supervisor and the original completed form sent to the Region 2 Health and Safety Staff for review.

Name(s): ROSANA CARBAUER CORU
JESSE AVILES

Cell or Field Phone No: 787 463 4388
787 378 3953

Division/Branch: CEPD/RURA

Supervisor: MR. R. TOKKES

Date(s) of Proposed Fieldwork: 2016 04 22 (FRIDAY)

Description of Field Activities: (include monitoring equipment to be used)

WALK-THROUGH OF THE FACILITY AND VISIT AREAS
OF CONCERN. THIS VISIT IS PART OF FY16 INITIATIVE

Hazard Identification: (check all that are appropriate)

Physical

- ☒ Noise
- ☒ Impact Hazards (flying dust, particles, chips)
- ☐ Puncture
- ☒ Cuts/Lacerations
- ☐ Compression (pinch, crush, rollover)
- ☒ Heat (sparks, splash, stress)
- ☐ Risk of Falls (>6ft.)

- ☐ Cold (cryogen, stress)
- ☐ Light (optical radiation)
- ☐ Electric Shock
- ☐ Explosion Hazard
- ☐ Ionizing Radiation
- ☐ Work Over Water
- ☒ Ergonomic Hazards

Comments: THE FACILITY TO BE INSPECTED (TOTAL TERMINAL
STU AIRPORT) IS AIMED FOR USED OIL.

Reminder: EPA employees are not permitted to enter confined spaces. If in doubt about a particular situation, do not enter and consult the Facilities & Administrative Management Branch at 212-637-3333.

Biological

- ☐ Blood borne Pathogens
- ☐ Animals/Snakes/Insects
- ☐ Plants, eg poison ivy/oak
- ☐ Microbiologicals, molds, etc

Chemical

- ☒ Vapors/Gases
- ☒ Dusts/Fumes/Mists
- ☐ Liquid Splash
- ☐ Oxygen-Deficient/Enriched (<19.5->23%)

Comments: SEE ABOVE

PPE Recommendations:

Respiratory Protection (Work Level D, upgrade as needed)

- ☐ Half-face Air Purifying Respirator
- ☐ Full-face Air Purifying Respirator
- ☐ Powered Air Purifying Respirator SCBA

Respirator Required Protection Levels

Upgrade to Level C when: VOCs @ FID=10 ppm
PID=20 ppm: H₂S 10 ppm, Dust 5 mg/m³
CO 20 ppm(no cartridge available, evaluate),
LEL >5% Leave and evaluate, may work to 10%

Eye, Face and Head Protection

- ☒ Safety Glasses
- ☐ Goggles
- ☐ Face Shield
- ☒ Hard Hat

Hearing Protection

- ☐ Ear Muffs
- ☒ Ear Plugs

Hand Protection

- ☐ Leather Work Gloves
- ☐ Chemical-Resistant Gloves Type:
- ☐ Rubber Insulating Gloves

Foot Protection

- ☒ Steel Toe Work Boots
- ☐ Chemical Resistant Boots
- ☐ Puncture Protection

Body Protection

- ☐ Apron
- ☐ Coveralls Material, Weather Appropriate:
- ☐ Personal Floatation Device
- ☐ Body Harness
- ☐ Exposure Suit, eg Tyvek
- ☐ Other: N/A

- ☐ Reflective Safety Vest

Comments: Employee signature implies concurrence. Add Emergency Contact # and Route to nearest hospital (attach if needed)

HOSP. UPR CAROLINA / CARR #3 km 8.3 CAROLINA / 787 757 1800
HOSP. ASHFORD / AVE. ASHFORD CONDADO / 787 721 2160

Employee's Signature/Date

Employee's Signature/Date

Employee's Signature/Date

Employee's Signature/Date

Employee's Signature/Date

Supervisor's Signature/Date

[Signature] 2016-04-21
[Signature] 2016-04-22



U.S. EPA REGION 2

INSPECTOR'S MULTI-MEDIA SCREENING CHECKLIST

Facility Name: <i>Total Terminal (SSU)</i>	Facility Point of Contact and Title: <i>Mr. Pedro Rodriguez</i>
Facility Address: <i>Base Muniz</i> <i>Carolina, P.R. 00979</i>	Facility POC Phone and E-mail: <i>Hector Sanchez (787) 792-2920</i> <i>Rolando Valquez (787) 354-2123</i>
Inspector Name and Phone: <i>Rosana Cabalka (787) 977-5880</i> <i>Jesse Auk's (787) 977-5882</i>	Date of Inspection: <i>2016 04 22</i>

Make referrals directly via email only to Erin Floto, Multi-Media Referrals Coordinator (MMRC)

Floto.Erin@epa.gov

Date of Referral: _____

Supervisors may be cc'd on email

****Guidance for completing the Multi-Media Inspection Checklist****

The Multi-Media Screening Checklist should be filled out during the visit.

Inspectors are not expected to be experts in all media. If something looks odd or suspicious, use the provided questions, document and take photos of the suspicious activity. If you answer yes to any of the questions below, inform the MMRC ASAP that you observed possible non-compliance in another program area during your inspection and send the checklist including comments and photographs to complete the referral.

Inspectors should record preliminary observations on this checklist, which can assist in determining compliance at a later date. Compliance determinations are not made in the field.

Please remember when submitting this checklist to provide *detailed* comments and photos for each section you observe possible non-compliance activities

AIR

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe dark or white smoke or dust clouds from any source?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe opaque (obscuring) smoke being emitted for >5 minutes? (If possible, take video)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you notice any unusual odors or strong chemical smells?

WATER

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe poorly maintained equipment/containers exposed to precipitation?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe pollutants (e.g. petroleum, oil, chemicals, sediments, process water, etc.) going into an indoor floor drain or outdoor catch basin?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe a discharge from a pipe to surface water that was turbid or had a strange odor, color, sheen or foam?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you observe heavy (earth-moving) equipment adjacent to apparent wetland areas?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any clearing, filling, dredging, ditching, construction, etc. being conducted on or over the wetland areas?

HAZARDOUS WASTE AND CHEMICALS

<input type="checkbox"/> Yes	<input type="checkbox"/> No	Did you observe evidence in work areas, storage areas or laboratories of abandoned containers or materials? Please note as much information about the contents of the containers and types of materials, including their chemical/physical properties as possible in comments along with the reason believe they have been 'abandoned'.
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Did you observe any containers or tanks that contained materials/substances that were leaking, damaged, or in poor condition? Please note as much information about the contents of the containers or tanks as possible in comments, including their chemical/physical properties along with the condition of the containers/tanks.

PESTICIDES

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe pesticides sold in unlabeled containers or with hand-written labels or with labels with no English?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe possible improper use of pesticides (adverse human reaction, dead animals, plant damage, etc.) or storage of pesticides (open containers, unconstrained gas canisters, no ventilation in storage room, etc.)?

TOXIC AND HAZARDOUS SUBSTANCES/MATERIALS

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any liquid-filled electrical equipment or hydraulic systems that the facility representative confirmed were installed pre-1980?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any electrical equipment leaking or did you observe stains on the floor or concrete pad near such equipment?

OIL STORAGE/SPILLS

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe rainbow sheen or foam on surface waters or ground or next to storm drain?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Did the facility have an oil spill within the last 12 months that reached surface waters?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any automatic tank gauge in alarm status for underground storage tanks (USTs)?

EMERGENCY RESPONSE & PREVENTION

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe an oil spill or chemical spill into secondary containment, storm drain, or a waterway?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Is the facility under emergency operations, evacuation, or shelter in place due to an actual chemical or oil release, or potential for chemical or oil release?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe a chemical, flammable, or oil release, including a spill or explosion, into the air, water, or soil?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe process equipment in poor condition that could result in a release? (corrosion, lack of maintenance)

WORKER SAFETY

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe employees working in dangerous conditions (excessive noise, chemical exposure, at heights above 10ft) without proper PPE?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe employees entering or working in confined spaces (vaults, pits, tanks, enclosures not designed for occupancy) with limited access/ingress/egress?

CRIMINAL ACTS

(Do not read aloud)

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any deliberate acts of dumping or discharging wastes?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe actual harm to individuals as a result of EPA violations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe other activity or behavior that indicates possible criminal behavior?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Did you observe an alteration of facility records that would constitute a potential criminal violation?

COMMENTS AND PHOTOGRAPHS:

Following your visit, please use this section to type detailed comments concerning possible non-compliance activities and photographic evidence of those activities. Please include the media title for each comment.

(i.e. AIR: _____)

